

FILED

JUL 14 2022

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA, ) INDICTMENT  
                                )  
Plaintiff,                 )  
                                )  
v.                            ) CASE NO. **1 : 22 CR 391**  
KAMERON G. BROWN,        ) Title 21, United States Code,  
                               ) Sections 841(a)(1), (b)(1)(B) and  
Defendant.                 ) (b)(1)(C)

**JUDGE BOYKO**

ENHANCED PENALTY UNDER TITLE 21,  
UNITED STATES CODE, SECTION 841(b)(1)(B)  
(Prior Serious Violent Felony Conviction, 21 U.S.C. § 841(b)(1)(B))

1. Before Defendant KAMERON G. BROWN committed the offenses charged in this Indictment, BROWN had a final conviction for a serious violent felony, namely, a conviction under Ohio Revised Code, Section 2911.01(A)(1), for Aggravated Robbery (F1), in Case Number CR-08-518181 in the Cuyahoga County Court of Common Pleas, on or about February 11, 2009, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of each of the instant offenses charged in this Indictment.

COUNT 1  
(Possession with Intent to Distribute a Controlled Substance,  
21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

The Grand Jury charges:

2. The allegations contained in paragraphs 1 of this Indictment are incorporated by reference as if stated fully herein.

3. On or about April 19, 2022, in the Northern District of Ohio, Eastern Division, Defendant KAMERON G. BROWN did knowingly and intentionally possess with intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 2

(Possession with Intent to Distribute a Controlled Substances,  
21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

4. On or about April 19, 2022, in the Northern District of Ohio, Eastern Division, Defendant KAMERON G. BROWN did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of acetylfentanyl, a Schedule I controlled substance, a fentanyl analogue; 4-ANPP, a Schedule II controlled substance; and fentanyl a schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 3

(Possession with Intent to Distribute a Controlled Substances,  
21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

5. On or about April 19, 2022, in the Northern District of Ohio, Eastern Division, Defendant KAMERON G. BROWN did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of 4-ANPP, a Schedule II controlled substance; and fentanyl a schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

FORFEITURE

The Grand Jury further charges:

6. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, the allegations of Counts 1 through 3 are incorporated herein by reference. As a result of the foregoing offenses, Defendant KAMERON G. BROWN shall forfeit to the United States any and all property constituting, or derived from, any proceeds he obtained, directly or indirectly, as the result of such violations; and, any and all of his property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations.

A TRUE BILL

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.